

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

<b>JENNIFER GAFFNEY,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CASE NO. 3:15-CV-01441</b>
	)	
<b>KENTUCKY HIGHER EDUCATION</b>	)	
<b>STUDENT LOAN CORPORATION,</b>	)	
	)	
<b>Defendant.</b>	)	

**MOTION OF DEFENDANT KENTUCKY HIGHER EDUCATION STUDENT LOAN  
CORPORATION ("KHESLC") TO: (1) SET A JUDICIAL SETTLEMENT  
CONFERENCE OR MEDIATION; (2) CANCEL A RULE 30(b)(6) DEPOSITION OF  
KHESLC; AND (3) AMEND THE CASE MANAGEMENT ORDER**

Pursuant to Local Rule 16.02(d) KHESLC moves for an order which will refer this matter either for a judicial settlement conference or for mediation. KHESLC further requests an order which will quash a notice of deposition and cancel a deposition of KHESLC which the plaintiff has noticed under Rule 30(b)(6), F.R.C.P., for February 17, 2017 in Louisville, Kentucky and which will amend the Case Management Order (DE No. 25) by extending the deadline for completion of discovery from the present deadline of March 1, 2017 to April 1, 2017. (As indicated in the accompanying affidavit of counsel for KHESLC, he has conferred with opposing counsel in an attempt to reach agreement with respect to these matters and such an extension of this discovery deadline should not affect any other deadlines under either the Case Management Order (DE No. 25) or the Order setting this case for trial (DE No. 26)).

Grounds for this motion are that the requested relief likely would result in resolution of this matter by settlement and would reduce the overall expenditures of time, money, and

resources of the parties and the Court.

/s/ Darrell G. Townsend

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*Attorneys for Defendant Kentucky Higher  
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**CERTIFICATE OF SERVICE**

I certify that on February 8, 2017, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

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/s/ Darrell G. Townsend

**DARRELL G. TOWNSEND**